

## Remote Processing of Medication Orders Board of Pharmacy Guideline

The following guidelines must be met by Washington pharmacies and providers of remote medication order processing services:

1. Medication order processing does not include the dispensing of a prescription drug but includes any of the following<sup>1</sup>:
  - a. receiving, interpreting, or clarifying medication orders;
  - b. data entry and transferring of medication order information;
  - c. performing drug regimen review;
  - d. interpreting clinical data;
  - e. performing therapeutic interventions, and
  - f. providing drug information concerning medication orders or drugs.
2. A Washington pharmacy may outsource medication order processing to another pharmacy provided the pharmacies have the same owner; or the pharmacy has entered into a written contract or agreement with an outsourcing company which outlines the services to be provided and the responsibilities and accountabilities of each pharmacy in compliance with federal and state laws and regulations. The pharmacy providing the remote processing of medication orders must be approved by the Board of Pharmacy.
3. A pharmacy providing remote medication order processing must insure that all pharmacists providing such services have been trained on each pharmacy's policies and procedures relating to medication order processing. Such training shall include policies on abbreviations, administration times, automatic stop orders, substitution, and formulary compliance.
4. The pharmacies must share common electronic files or have appropriate technology to allow secure access to the pharmacy's information system and to provide the remote pharmacy with access to the information necessary or required to process a medication order.<sup>2</sup>
5. A pharmacy using remote order entry processing services is responsible for maintaining records of all orders entered into their information system including orders entered from a remote location. The system shall have the ability to audit the activities of the individuals remotely processing medication orders.

6. All pharmacies and pharmacists providing remote order processing services to pharmacies in Washington state must be licensed in Washington. An out-of-state pharmacy providing remote order processing services must be licensed as a non-resident pharmacy.<sup>3</sup>
7. All pharmacies involved in remote order processing shall maintain a policy and procedure manual. Each remote pharmacy is required to maintain those portions of the policy and procedure manual that relate to that pharmacy's operations. The manual shall:
  - (A) outline the responsibilities of each of the pharmacies;
  - (B) include a list of the name, address, telephone numbers, and all license/registration numbers of the pharmacies involved in remote order processing; and
  - (C) include policies and procedures for:
    - (i) protecting the confidentiality and integrity of patient information;
    - (ii) maintenance of appropriate records to identify the name(s), initials, or identification code(s) and specific activity(ies) of each pharmacist who performed any processing;
    - (iii) complying with federal and state laws and regulations;
    - (iv) operating a continuous quality improvement program for pharmacy services designed to objectively and systematically monitor and evaluate the quality and appropriateness of patient care, pursue opportunities to improve patient care, and resolve identified problems; and
    - (v) annually reviewing the written policies and procedures and documenting such review.

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<sup>1</sup> WAC 246-875 Pharmacy-patient medication record systems

<sup>2</sup> RCW 69.41.055 and WAC 246-870 Electronic communication of prescription information

<sup>3</sup> RCW 18.64.350 Nonresident pharmacies